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Dee May  
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EX PARTE OR LATE FILED

**Ex Parte**

RECEIVED



November 24, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW – Portals  
Washington, DC 20554

RE: Application by New York Telephone Company (d/b/a Bell Atlantic – New York), et al., for Authorization To Provide In-Region, InterLATA Services in New York, Docket No. 99-295

Dear Ms. Salas:

As part of its ongoing oversight, the New York PSC Staff has brought to our attention inaccuracies in Bell Atlantic's reply filing that should be corrected.

First, the Staff pointed out that the chart in Attachment A to the Lacouture/Troy Reply Declaration inadvertently understated the number of hot cut orders and lines for the month of September. In addition the "total" column in Attachment A did not accurately sum the numbers included in the prior columns. The incorrect numbers from the chart were reflected in the text of paragraph 37 of the reply declaration. A corrected Attachment A and paragraph 37 are attached (with corrected numbers in bold).

Second, the Staff pointed out the September Carrier to Carrier report, which was attached to the Dowell/Canny Reply Declaration as Exhibit C, reported an incorrect number of hot cut orders and "I-codes" (see metric numbers PR-4-06 and PR-6-02). A corrected page that is being filed with the New York PSC is attached.

As outlined in the Public Notice (DA-99-2014) issued by the FCC on September 29, 1999, the 20 page ex parte limit does not apply to this ex parte since Bell Atlantic is correcting documents contained in its Reply submitted in the above proceeding.

Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

*Dee May / sm*

Enclosures

cc: A. Kearney

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## Corrected Hot Cut Report

Hot Cut Performance	Jun	Jul	Aug	Sept	Oct*	Total
Total HC orders worked	443	1326	1506	2493	1688	7456
Met (C2C Guidelines)	412	1204	1412	2343	1544	6915
% met	93.0%	90.8%	93.8%	94.0%	91.5%	92.7%
Missed	31	122	94	150	144	541
Due Date Changes	193	448	330	467	513	1951
Canceled	35	96	41	31	20	223
Total Orders Scheduled	671	1870	1877	2991	2221	9630
Total Lines	2755	7330	7403	8850	6496	32834

\* Through October 21, 1999

Corrected Paragraph 37 Lacouture/Troy Reply Declaration

37. Contrary to claims of some commenters (primarily AT&T), BA-NY has implemented an effective hot cut process to move a loop that is in service from BA-NY's switch to the CLEC's switch without significantly disrupting the customer's service. Between June 21, 1999, when BA-NY began using the New York Public Service Commission's tracking checklist, and October 21, 1999, BA-NY completed **nearly 93** percent of its **7,456** hot cut orders on time. Attachment A. This on time performance figure includes the July data that has been reconciled by the New York Public Service Commission, as further explained below. Since there are about 5 lines per order, BA-NY has successfully completed **32, 834** hot cut lines. BA-NY was able to provide this high level of performance despite a high level of churn involving hot cuts. During the same period, BA-NY received **1,951** date changes in connection with hot cuts and **223** cancelled hot cut orders. Attachment A. Based on an extensive record, the New York Public Service Commission confirmed that BA-NY is meeting the checklist requirement for loops. NY PSC Comments at 99.

**Carrier to Carrier - Addendum****Bell Atlantic - New York State****UNE POTS - Provisioning**

Metric #	August 1999	Standard	CLEC Aggregate	
			Performance	Observations
PR-6-02	% Installation Troubles reported within 7 Days - Hot Cut Loop	< = 2%	0.55	7403

Metric #	September 1999	Standard	CLEC Aggregate	
			Performance	Observations
PR-4-06	% On Time Performance - Hot Cut	95% Completed Within Window	93.98	2493
PR-6-02	% Installation Troubles reported within 7 Days - Hot Cut Loop	< = 2%	0.25	8850